

EXHIBIT 121

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF MICHAEL BZDYRA

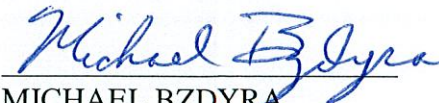
Pursuant to 28 U.S.C. 1746, I, Michael Bzdyra, having been duly sworn, depose and say, based on my personal knowledge and belief:

1. I am the Commissioner of the State of Connecticut Department of Motor Vehicles (“DMV” or “the Department”).
2. DMV is the state agency that oversees driver’s licenses, vehicle registration and other functions related to motor vehicles.

3. I was appointed as Commissioner of the Department in March, 2016. Previously I was employed as Acting Deputy Commissioner for the Department from September, 2014 through February, 2016, and as Executive Assistant to the Commissioner of Motor Vehicles from January, 2011 through August, 2014.
4. I am responsible for overseeing all functions and employees of the Department, which consists of 727 full-time and 97 part-time employees. My current duties generally include those enumerated in section 14-3 of the Connecticut General Statutes.
5. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I do not have personal knowledge, I have reviewed information gathered from DMV records by others within the organization.
6. Since 2012, Connecticut has granted driver's licenses to approximately 5000 residents of Connecticut who are beneficiaries of the Deferred Action for Childhood Arrivals (DACA) program.
7. It is highly probable that since the DACA program went into effect in 2012, DACA grantees have also registered cars in Connecticut, although the numbers are not readily accessible through DMV's data collection process. In addition to purchase and ownership documents, DACA grantees would only be required to show their driver's licenses to register a vehicle in the state.
8. DACA grantees who have purchased and registered a vehicle in Connecticut have paid sales tax if the vehicle was purchased from a dealer, or use tax on a private purchase.
9. After registering a vehicle, a DACA grantee, like any other the owner, would also pay motor vehicle property tax to the municipality where the owner lives or where the vehicle is garaged.

10. The DACA grantees who have driver's licenses and registered vehicles also purchase automobile insurance, are likely to have used local driving schools for driver training and pay applicable licensing, registration, title and other fees to the State of Connecticut.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


MICHAEL BZDYRA

DATED: September 20, 2017